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From: firechief@dixfield.org
Sent: Thursday, October 29, 2009 11:05 PM
To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 083-B - Supplied Air Respirators (SAR) Comments

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Comments
To Whom It May Concern:

I am writing in response to NIOSH's proposal to change 42 CFR part 84, subpart J, to include Cylinders and Cylinder values in the approval process for Self Contained Breathing Apparatus. Current regulation by the Department of Transportation has proven to very sufficient and safe. Including cylinders into the approval process will not improve safety but will be detrimental to organizations such as mine, a small volunteer/paid-on-call fire department.

Even now cylinders are expensive, but by eliminating options on where we may purchase them will drive up the cost. We will be at the mercy of a sole manufacturer – the brand of SCBA that we utilize. In addition, it is likely that the manufacture will control (limit) product innovation, availability and possibly even interoperability with existing equipment or competing brands. This will be disastrous for organizations such as ours, as well as the thousands like us across this country. A concern I, and my local counterparts, share is the fear that SCBA manufacturers will create proprietary systems which will not work with other brands used by neighboring departments. If we are forced to scrap equipment that we have and all purchase the same thing, in effect we will end up wasting thousands of dollars received by Federal grants to purchase equipment that we currently own.

It makes no sense to destroy a system that is working well. Cylinders are more than adequately regulated by DOT. The only purpose served will be to create monopolies for the few SCBA manufacturers. Please do not add SCBA cylinders to the NIOSH approval process of Supplied Air Respirators.